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April 29, 2004

MAY 03 2004

Illinois EPA, Division of Air Pollution Control  
Compliance and Enforcement Section  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

**AIR ENFORCEMENT BRANCH,  
U.S. EPA, REGION 5**


**RE: CAAPP Annual Compliance Certification for IBA S&I, Inc. Willowbrook Facilities for Calendar Year 2003, ID No. 0431110AAC.**

To Whom It May Concern,

Enclosed please find IBA S&I, Inc. Annual CAAPP Compliance Certification for our facilities located at 7775 Quincy Street and 830 Midway Drive, Willowbrook, Illinois. Both facilities were in continuous compliance during the year; therefore, we only included Table One.

Please do not hesitate in contacting me should you have any questions with regard to the enclosure or these facilities. You can reach me at 630-928-1724.

Yours truly,

  
Stephen Dana Morris  
Director EH&S

Enclosure: Annual CAAP Certification & Table One

cc: Ms. Kathleen Hoffman, VP EH&S  
Mr. Jack Fitzpatrick, General Manager Willowbrook Facilities

Illinois EPA  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

USEPA Region 5 (AR-17J)  
Air & Radiation Division  
77 West Jackson Blvd.  
Chicago, IL 60604



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF AIR POLLUTION CONTROL  
COMPLIANCE AND SYSTEMS MANAGEMENT SECTION  
1021 NORTH GRAND AVENUE EAST, P O BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276

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AIR ENFORCEMENT BRANCH,  
U.S. EPA, REGION 5

<b>CAAPP ANNUAL COMPLIANCE CERTIFICATION</b>	<b>FOR AGENCY USE ONLY</b>
	ID NUMBER
	PERMIT #
	DATE

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6(c)(5), 39.5(7)(p)(v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

SOURCE INFORMATION			
1) SOURCE NAME <b>IBAS &amp; J, Inc</b>			
2) SOURCE ADDRESS <b>7775 Quincy Street</b>			
3) CITY <b>WILLOW BROOK</b>		4) COUNTY <b>Du Page</b>	
5) TOWNSHIP <b>DOWNERS GROVE</b>	6) STATE <b>ILL.</b>	7) ZIP CODE <b>60521</b>	
8) DATE FORM PREPARED <b>4/29/04</b>		9) SOURCE ID NO <b>043110AAC</b>	
10) CAAPP PERMIT NO <b>95120085</b>			
11) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT <b>2003</b>			

SOURCE COMPLIANCE INFORMATION
12) CHECK EITHER (a) OR (b) BELOW
(a) <input checked="" type="checkbox"/> During the entire reporting period, this source was in <b>continuous</b> compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
(b) <input type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in <b>continuous</b> compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
<b>NOTE: Table 1 must be completed for all units and activities regardless of compliance status. Table 2 must be completed for all sources of intermittent or continuous noncompliance with any permit condition.</b>

**ATTACHMENTS**13) Are you submitting any attachments with this report? Yes ☒ No ☐

If yes, please list the attachments below

TABLE 1**COMPLIANCE CERTIFICATION REPORT MAILING**14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.**Please check the appropriate boxes.**

A copy of the Compliance Certification report has been submitted to USEPA.

Yes ☒ No ☐

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

Yes ☒ No ☐**SOURCE CONTACT PERSON**

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT

Stephen MORRIS

16) TECHNICAL CONTACT PERSON TITLE

Dir EH&S

17) CONTACT PERSON'S TELEPHONE NUMBER

630-928-1724**COMPLIANCE STATEMENT AND SIGNATURE BLOCK**

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE

BY



AUTHORIZED SIGNATURE

Stephen DANA MORRIS

TYPED OR PRINTED NAME OF SIGNATORY

Director EH&S

TITLE OF SIGNATORY

04 , 29 , 04

DATE

Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source ID Number	
IBA S&I, Inc.		043110AAC	
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Compliance Status: Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
5.2.1	Cold cleaner degreaser shall comply with applicable standards.	N/A	We currently do not have any cold cleaners in use.
5.2.2	Particulate emissions shall be controlled according to the regulations.	C	No particulates are emitted from our systems.
5.2.3	Organic material emission units do not exceed 8.0 #s/hr according to the regulations	C	All emission units have their own specific permit condition.
5.3.2	Permittee must notify IEPA of any additional insignificant activities.	C	No additional insignificant activities were added.
5.2.2 (a)	No person shall cause or allow the emission of fugitive particulate matter from any process.	C	Our process does not generate fugitive particulates.
5.2.2 (b)	Opacity shall not exceed 30%.	C	Our process does not generate fugitive particulates.
5.2.3 (a)	Persons opening appliances for maintenance, service, repair, or disposal must comply with the required ozone depleting practices.	C	Our maintenance staff follows the proper ozone depleting procedures
5.2.3 (b)	Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.	C	Our maintenance staff follows the proper ozone depleting procedures.
5.2.3 (c)	Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.	C	One of our maintenance staff is certified for working on equipment containing ozone depleting chemicals.
5.2.4 (b)	The RMP Plan will be updated according to the regulations.	C	The plan will be updated as June 20, 2004.

Listing of Compliance Status for Applicable Permit Terms and Conditions.

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5.2.5 (a)	Should this stationary source become subject to a regulation under 40 CFR 60,61 or 63, or 35 IAC after the date issued then the facility will comply with the new regulation.	C	No new regulations have been promulgated that affect this facility.
5.2.5 (b)	Applicability of new regulations.	~	This certification will be filed on or before the expiration of the permit. However, since no new regulations have been promulgated it does not need to be filed.
5.2.5 (c)	The facility will comply with 40 CFR 63 Subpart A & O	C	The facility is in compliance with those sections that are applicable.
5.2.6 (a)	Episode Action Plans	N/A	We are not required to comply with this section.
5.6.1	Emission Records.	C	Emission records are being maintained
5.6.2	Storage Vessels	N/A	We don't have storage vessels this large.
5.6.3	Retention of records-5 years	C	All required records are being maintained
5.7.1	Source wide reporting requirements for deviations.	C	No deviations of permit conditions occurred.
5.7.2	Annual emissions report.	C	Annual reports were filled as required.
5.3 (a)	Retention of records for seasonal allotment	C	Records were available.
5.3 (b)	Emissions greater than 10 tons.	N/A	We do not emit VOM's greater than 10 tons.
7.1.2 (c) I	Emissions greater than 8#/hr.	N/A	We are exempt from this regulation.
7.1.2 (c) II	Emissions greater than 8#/hr are allowable if controlled to 85%.	C	Emissions are controlled by at least 85%.
7.1.2 (d) I & II	Emission and capture are at least 81%	C	See response to 7.1.2 (c) ii.
7.1.2 (d) III	Repair are component from which a leak of VOL can be observed.	C	Leaks of VOL are repaired once they are found.
7.1.5 (a)	Should WB I Scrubber 1 go down then emissions will be diverted to scrubber 2.	C	WB I Scrubber 1 did not break down allowing emissions to run without control.
7.1.5 (b)	Good manufacturing practices will be followed for the maintenance of equipment.	C	
7.1.5 (c)	No more than 5 chambers will be exhausted at once to the scrubbers.	C	We control this provision by means of our computer system.
7.1.6 (a)	No more than 99 tons of organic material can emitted per year.	C	WBI did not emit 99 tons in 2003.
7.1.6 (b)	Retort 8 did not emit 25 tons in 2003.	C	Records did not indicate an emission rate this high.

Listing of Compliance Status for Applicable Permit Terms and Conditions.

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7.1 6 ( c ) (i)	Deoxx will reduce emissions by at least 99%	C	Previous performance testing showed at least 99% efficiency.
7.1 6 ( c )(ii)	Monthly usage will not exceed 2,800# of PO and 70,000# EO.	C	We did not exceed these levels.
7.1.6 ( c )(iii)	Emissions from all other emission units shall not exceed nominal emission rates of 0 1#/hr and 0.44 ton/yr.	C	Emissions from other emission sources did not exceed these levels.
7.1 6.( d)	Compliance with annual limits shall be determined by means of a rolling average.	C	A rolling average is being done monthly.
7.1 7 (a)(i)-(ii)	Testing requirements.	C	All required testing has been completed.
7.1 7 (b)(i)(B)	Determine max. liquor tank level during performance test.	C	This level is in use during the year.
7.1 7(b)(ii)	Liquor tank level greater than during the performance test is a violation.	C	This level was not exceeded during the year.
7 1 8 (a)	AAT Scrubber System (Scrubber and Dry Beds are in compliance with Region V requirements.	C	Monitoring the dry beds show compliance.
7 1 8 (b)	Liquor tank level is monitored weekly.	C	Levels have not been exceeded.
7 1 8 ( c)	Leak detection methods.	N/A	
7 1 8 (e)	Records of Malfunction and Breakdowns of Willowbrook I Scrubber 1 or 2	C	There were no breakdowns or malfunctions that occurred that resulted in the scrubber continued use.
7.1 8 (f)	Records of periodic inspection and prompt repair of Willowbrook I Scrubber 1 or 2 are maintained	C	Records are maintained.
7.1 8 (g)	Records of the type and amount of gas used for each affected chamber is maintained.	C	Records are maintained.
7.1.8 (h)	Records of monthly and aggregate annual VOM and HAP emissions from the chambers.	C	Records are maintained.
7 1.10	Records of compliance deviations.	C	No deviations of permit conditions occurred.
7.1.12	Performance Testing.	C	There were no performance tests run during the year.
7.2.3 (b)	Emissions will be reduced by 99%.	C	Efficiency was developed during previous performance test.
7.2.3 ( c)	Emissions will be reduced by 85%.	C	AAT Scrubber emissions are reduced by at least 85%.

Listing of Compliance Status for Applicable Permit Terms and Conditions.

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7.2.3 (d) (i)-(ii)	Emissions will be controlled by at least 81%	C	See 7.2.3 ( C).
7.2.3 (d) (iii)	Any leaks need to be repaired within 15 days.	C	All leaks are repaired within the 15 day time period.
7.2.5 (a)	Malfunction and Breakdown provisions.	C	There were no breakdowns or malfunctions that occurred that resulted in the scrubber continued use
7.2.5 (b)	The facility will follow good operating practices for the scrubber and dry bed reactor.	C	See 7.2.5 (a).
7.2.5 (c)	No more than three chambers may exhaust to the AAT Scrubber at one time.	C	There are controls in place to limit the number of chambers that can exhaust to the scrubber at one time.
7.2.6 (a)	Emissions and operation of the five chambers will exceed the emissions limits.	C	We did not exceed these levels.
7.2.6 (c)	HAP emissions from the five chambers and two aeration rooms shall be less than 10 tons/yr.	C	Total emissions that were sent through the scrubber were less than 10 tons.
7.2.6 (d)	Yearly emissions were calculated by means of a rolling average	C	A rolling average is being done monthly.
7.2.7	Testing requirements.	C	All performance testing was previously completed.
7.2.8	Monitoring requirements	C	Monitoring of the AAT Scrubber is on going.
7.2.9(a)-(c)	Recordkeeping Requirements	C	All leaks are repaired within the one hour time period or records are maintained.
7.2.9(d)	Control device monitoring data.	C	Records are maintained.
7.2.9(e)	Records for Malfunctions and Breakdowns of the WB II Scrubber	C	Records are maintained.
7.2.9(f)	Records of Good Operating Practices	C	Records are maintained.
7.2.9(g)-(h)	Records of the amount of sterilant gas used for each affected chamber in tons/mo and yr.	C	Records are maintained.
7.2.10(a)-(b)	Reporting requirements for excess emissions and monitoring system performance reports	C	No excess emissions reports needed to be filed.
7.2.10(c)	Malfunction and Breakdown provisions for WB II Scrubber .	C	No reports were necessary to be reported.

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7.2 12	Requirement to conduct performance testing.	C	No testing was required during the calendar yr 2003.
7 3 3(c)	Emissions must be controlled to 8#/hr unless they are not an odor issue or photochemically reactive.	C	Ethylene Oxide is not photochemically reactive or odiferous.
7 3.3(d)	Emission capture and control equipment must get at least 81% efficiency.	C	The AAT Scrubber system destruction efficiency is greater than 81%.
7 3 5	Need to periodically inspect the AAT System for good operating practices	C	System is checked monthly.
7 3 7	Testing requirements.	C	Required performance testing was previously conducted.
7 3 8(a)	AAT Scrubber System (Scrubber and Dry Beds are in compliance with Region V requirements	C	The dry beds are checked weekly to make sure that they are operating properly.
7.3 8(b)	Scrubber liquor level is checked weekly.	C	The scrubber liquor level is checked weekly.
7 3 9	Recordkeeping Requirements	C	All appropriate records are maintained
7.3 10	Reporting requirements for excess emissions and monitoring system performance reports.	C	There were no excess emissions.
7.4 3	Emissions from back vents are controlled to 99%.	C	Previous performance testing showed at least 99% efficiency.
7.4 5	Good manufacturing practices will be followed for the maintenance of equipment.	C	The system is checked monthly.
7.4 8(b)	Emissions from backvent and aeration vent are controlled to 99%.	C	Previous performance testing showed at least 99% efficiency.
7.4 10	Excess emissions need to be reported for backvent or aeration emissions.	C	There were no excess emissions.
7.5 3	WB I Aeration Room and chambers are controlled to either 1ppm or 99%.	C	The aeration room/chambers are in compliance.
7.5 5	Operational and production limits-Scrubber liquor level will not exceed 159".	C	The scrubber liquor level is checked weekly.
7.5 6	West Aeration Cell shall not exceed 3.6#/hr and/or 15.77tons/yr.	C	Ethylene oxide levels did not exceed this permit condition.
7.5 7	Dry beds are being controlled per agreement with US EPA Region V.	C	Weekly checks are performed to check for compliance.
7 5.8	Monitoring requirements for AAT Scrubber System.	C	The dry beds are checked weekly to make sure that they are operating properly and per the US EPA Region V Agreement.



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7.5.9	Recordkeeping Requirements for scrubber and dry bed.	C	All appropriate records are maintained.
7.5.10	Reporting requirements for excess emissions and monitoring system performance reports.	C	No deviations of permit conditions occurred.
7.6.3	Emissions from WB II Aeration Rooms will be controlled to 1 ppm or 99%.	C	The aeration room/chambers are in compliance.
7.6.5	Aeration room/AAT Scrubber liquor level for WB II will exceed 202".	C	The scrubber liquor level is checked weekly.
7.6.6	Emissions for the two aeration rooms will not exceed 2,000#/mo EtO or 6 tons/yr usage and 20#/mo or 0.06 tons/yr emissions and 13.33#/mo or 0.04 ton/yr usage and 0.13#/mo and 0.01 ton/yr of Propylene Oxide.	C	Records do not show an exceedance.
7.6.8	Monitoring Requirements-Dry beds.	C	The dry beds are checked weekly to make sure that they are operating properly and per the US EPA Region V Agreement.
7.6.9	Recordkeeping Requirements for scrubber and dry bed.	C	Records are maintained.
7.6.10	Excess emissions need to be reported for the aeration room exceedance.	C	No excess emissions reports needed to be filed.
7.7.5	Boiler will only be operated with natural gas.	C	Boiler is only operated with natural gas.
7.7.9	Fuel usage will be maintained.	C	Records are maintained.
7.8.9	Fuel usage will be maintained.	C	Records are maintained.